

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA
SAVANNAH DIVISION**

JEROME BLIGE,)
MARSHELL BERNICE LEE,)
and the ESTATE OF SAUDI)
ARAI LEE, by and through)
MARSHELL BERNICE LEE, its)
Administrator,)

VERSUS

ERNEST FERGUSON,)
IN HIS INDIVIDUAL CAPACITY;)
MACKENZIE RANDLE, IN HIS)
INDIVIDUAL CAPACITY;)
CITY OF SAVANNAH)

) **CIVIL ACTION NO.: 4:24-cv-00131-RSB-CLR**

) **JURY TRIAL DEMANDED**

EXHIBIT 1

David Utter

From: Taylor Dove <tdove@huntermaclean.com>
Sent: Thursday, April 10, 2025 3:47 PM
To: David Utter; Anthony Poulos; Lovett Bates; Pat O'Connor; Malcolm Mackenzie
Cc: Will Claiborne
Subject: RE: Jerome Blige et al., v. Ernest Ferguson, et. al.

David,

The City does intend on filing another MTD and will not oppose a motion to stay filed by Plaintiffs. I think it makes sense to go ahead and postpone next week's depositions.

Taylor Dove
Partner

HunterMaclean

200 E. Saint Julian Street | Savannah, GA 31401
P.O. Box 9848 | Savannah, GA 31412-0048
Main: 912.236.0261 | Direct: 912.238.2642 | Fax: 912.236.4936
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From: David Utter <david@claibornefirm.com>
Sent: Thursday, April 10, 2025 3:44 PM
To: Gracie Shepherd Saas <gsaas@huntermaclean.com>; Anthony Poulos <apoulos@olivermaner.com>; Lovett Bates <LBlovet@savannahga.gov>; Pat O'Connor <pto@olivermaner.com>; Taylor Dove <tdove@huntermaclean.com>; Malcolm Mackenzie <MMackenzie@wswwgs.com>
Cc: Will Claiborne <will@claibornefirm.com>
Subject: FW: Jerome Blige et al., v. Ernest Ferguson, et. al.

Counsel,

See below re: Plaintiffs' missive to the city yesterday. I've not heard back and assume we are proceeding with the depositions as scheduled next week. Will and I think a stay makes sense if the City files another MTD. Do folks agree or does the defense want to proceed with next week's depositions?

David

David J. Utter, Esq.
The Claiborne Firm, P.C.
410 E. Bay Street
Savannah, GA 31401
(912) 236-9559
david@claibornefirm.com

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From: David Utter

Sent: Wednesday, April 9, 2025 2:30 PM

To: Taylor Dove <tdove@huntermaclean.com>; Bates Lovett <BLovett@Savannahga.Gov>

Cc: Will Claiborne <will@claibornefirm.com>; Kim Griffin <Kim@claibornefirm.com>

Subject: Jerome Blige et al., v. Ernest Ferguson, et. al.

Taylor and Bates,

Is the City planning on filing a motion to dismiss Plaintiffs' 2nd Amended Complaint? If so, will you consent to a stay of discovery until the motion is decided?

Let me know soon given the pending depositions set for next week.

Many thanks,

David

David J. Utter, Esq.
The Claiborne Firm, P.C.
410 E. Bay Street
Savannah, GA 31401
(912) 236-9559
david@claibornefirm.com

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Thank You.
Hunter, Maclean, Exley & Dunn, P.C.
Savannah Office Telephone: 912.236.0261
Saint Simons Office Telephone: 912.262.5996